

Exhibit 2:

Excerpts from Deposition of Edward Yearta

IN THE DISTRICT COURT  
FOR THE UNITED STATES OF AMERICA  
WESTERN DISTRICT OF TENNESSEE

**EDWARD ALAN YEARTA,** Plaintiff, CIVIL ACTION NO.:  
vs. 2:17-cv-2117 SHM-egb  
**AMUSEMENTS OF AMERICA,**  
**INC.; DELTA FAIR, INC.;**  
**UNIVERSAL FAIRS, LLC;**  
and **BELLE CITY**  
**AMUSEMENTS, INC.,**  
Defendants.  
**AMUSEMENTS OF AMERICA,** VOLUME I OF IV  
**INC.,** Crossclaim Plaintiff,  
vs.  
**BELLE CITY AMUSEMENTS,**  
**INC.,** Crossclaim Defendant.

## OBAT: VIDEO DEPOSITION OF

## **EDWARD YEARTA**

**MAY 3RD, 2018**

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19 ORAL VIDEO DEPOSITION of EDWARD YEARTA taken  
in the above-styled and numbered cause on May  
20 3rd, 2018, from 8:40 a.m. until 7:33 p.m. before  
Carol P. Kellerman, Certified Court Reporter in  
21 and for the State of Georgia, in the conference  
room at 327 North Ashley Street and at 1564  
22 Baytree Road, Valdosta, Georgia.

24 Carol P. Kellerman, C.C.R.  
25 KELLERMAN COURT REPORTING, INC.  
26 Phone No.: (229) 245-0317

1 Q. How -- how does it become locked into  
2 place?

3 A. Wherever they pull it up to the mark.

4 Q. Okay. Is there something that then  
5 kind of connects it to the ground?

6 A. A ground wire I reckon.

7 Q. Okay. Do you recall seeing whether or  
8 not the generator had ground wire?

9 A. It was grounded, but I don't know how  
10 -- if it was grounded right.

11 Q. Okay. But you recall that it was  
12 grounded?

13 A. Yes.

14 Q. Okay.

15 MS. TULLIS: Those are all the  
16 questions I have. Thank you.

17 MS. NELSON: I have actually some  
18 follow-up. I'm sorry.

19 MR. TEITENBERG: I think you've  
20 got about six minutes.

21 (Court Reporter's Note: There was  
22 a brief discussion held off of the  
23 record.)

24 **RE-EXAMINATION**

25 BY MS. NELSON:

1 Q. So, Mr. Yearta, in response to Ms.  
2 Tullis' question just a moment ago about whether  
3 the generator was grounded, you responded that,  
4 yes, it was grounded.

5 A. I don't know --

6 MR. TEITENBERG: Objection, form.

## 7 THE DEONENT CONTINUED:

8           A.     I don't know if it was grounded right.  
9     But it was grounded.

10 Q. (By Ms. Nelson) Explain that to me.  
11 A. I don't know if the rod was drove in  
12 the ground deep enough or not.

13 Q. Did you see grounding rods at that  
14 generator truck?

15 A. Yes.

16 Q. What did they look like?

### 17 A. Copper wire.

18 Q. Explain that to me.

19 A. Copper rods with a clamp on it that's  
20 got a wire, a grounding rod, connected to it.

21 Q. And do you know who placed those rods?

22 A. No, I don't.

23 Q. And were they driven into the ground?

24 A. Yes, but I don't know if they was deep  
25 enough.

1 Q. Can you show me?

2 MS. NELSON: May I see the last  
3 exhibit please?

4 UNIDENTIFIED PERSON: (Complies.)

5 THE DEPONENT CONTINUED:

6 A. Where they was at?

7 Q. (By Ms. Nelson) Yes.

8 A. Probably right here.

9 Q. You just said that they were probably  
10 right there.

11 A. They're somewhere right there in front  
12 of the box, yes.

13 Q. Are you certain that you saw them?

14 A. Yes. I wouldn't have hooked up to it  
15 if it wasn't grounded.

16 Q. How many rods were there?

17 A. All I seen was -- I mean, one that I  
18 know of. I don't know if they grounded it twice  
19 or not. I know I seen one.

20 Q. How many grounding rods are usually  
21 used to your --

22 A. Usually --

23 Q. -- to your knowledge?

24 A. -- one -- one big one. Usually one  
25 good sized one. It's according to how deep they